

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MELVIN CENTENO, K-72719,	)	
	)	No. 08 CV 2756
Plaintiff,	)	
	)	Hon. James B. Zagel
v.	)	Judge Presiding
	)	
WEXFORD HEALTH SOURCES, INC.,	)	
et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' MOTION TO ENLARGE**

NOW COMES Defendant, VENITA WRIGHT, by and through her attorney, LISA MADIGAN, Illinois Attorney General, and moves this Court to grant Defendant additional time to respond to Plaintiff's complaint. In support of her motion, Defendant states:

1. Recently, Plaintiff filed a motion to amend his complaint, which this Court denied, without prejudice. (Court's Docket #13). Plaintiff failed to file a complete amended complaint, or in the alternative, move to substitute a named defendant for the "John Doe" in his complaint. Nevertheless, it appears that an amended complaint is forthcoming. Defendant requests that she not be ordered to file an answer until 21 days after the filing of Plaintiff's amended complaint.

2. Moreover, multiple defendants remain unserved at the time of this motion, or their requests for representation pursuant to the State Employee Indemnification Act have yet to be received by the Office of the Attorney General. It is anticipated that one or more of the unserved defendants will request representation as state employees.

3. Once the remaining defendants have been served, more time will be needed to investigate the allegations in the complaint and to investigate whether there are any conflicts exist by representing all of the served defendants.

4. In any event, it is likely that the state defendants in this case will share common defenses and litigation strategies.

5. In the interests of judicial economy, Defendants request an enlargement of time to file their responsive pleading so that once the remaining defendants are served, all defendants may further investigate the allegations raised in the complaint and check for any conflicts. It is anticipated that all defendants, once served, will file a single responsive pleading.

6. This motion is made in good faith and not for purposes of delay.

7. Plaintiff will not be unfairly prejudiced by the granting of this motion, but prejudice will inure if it is not granted.

WHEREFORE, Defendant VENITA WRIGHT respectfully prays that this Honorable Court grant this motion for enlargement of the time to file their response to Plaintiff's Complaint until 21 days after the filing of Plaintiff's amended complaint, or 21 days after the remaining defendants have been served.

Respectfully submitted,

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Attorney General of Illinois

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